

HONORABLE JOHN H. CHUN

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHENZHEN ROOT TECHNOLOGY CO., LTD.,
HONG KONG LUTE TECHNOLOGY CO.,
LIMITED, AND SHENZHEN CONGLIN E-
COMMERCE CO., LTD.,

Plaintiffs,

v.

CHIARO TECHNOLOGY LTD.,

Defendant.

CHIARO TECHNOLOGY LTD.,

Counterclaim Plaintiff,

v.

SHENZHEN ROOT TECHNOLOGY CO., LTD.,
HONG KONG LUTE TECHNOLOGY CO.,
LIMITED, SHENZHEN CONGLIN E-
COMMERCE CO., LTD, SHENZHEN ROOT E-
COMMERCE CO., LTD., SHENZHEN TPH
TECHNOLOGY CO., LTD., SHENZHEN
JINRUIXING TECHNOLOGY CO., LTD.,
SHENZHEN LUTEJIACHENG NETWORK
TECHNOLOGY CO., LTD., and SHENZHEN
JINRUIHANG TECHNOLOGY CO., LTD.,

Counterclaim Defendants.

Case No. 2:23-cv-631

**STIPULATION AND PROPOSED
ORDER TO EXTEND CASE
DEADLINES**

1 Pursuant to LCR 7(d)(1), Counterclaim Plaintiff Chiaro Technology Ltd. (“Counterclaim
2 Plaintiff”) and Counterclaim Defendants Shenzhen Root Technology Co., Ltd., Hong Kong Lute
3 Technology Co., Limited, Shenzhen Conglin Ecommerce Co. Ltd., Shenzhen Jinruihang
4 Technology Co., Ltd., and Shenzhen Lutejiacheng Network Technology Co., Ltd. (collectively,
5 “Moving Counterclaim Defendants”), through their respective undersigned counsel, hereby
6 stipulate to extend the time for Moving Counterclaim Defendants to answer or otherwise respond
7 to Counterclaim Plaintiff’s Counterclaim (Dkt. 69). The extension would move the deadline for
8 responding to the Counterclaim by 30 days to October 5, 2023.

9 Counterclaim Plaintiff and Counterclaim Plaintiff’s counsel further agree and acknowledge
10 that, other than the defense of insufficient service, this stipulation does not constitute a waiver of
11 any defense of Moving Counterclaim Defendants, including but not limited to the defense of lack
12 of personal jurisdiction or improper venue.

13 The parties respectfully submit that there is good cause for this stipulation. The extension
14 of time is reasonable under the circumstances, as the Counterclaim was filed on August 14, 2023,
15 comprises over 400 pages together with the Answer and exhibits, and will require counsel for
16 Counterclaim Defendants to respond on behalf of five Moving Counterclaim Defendants, all of
17 whom are located in China with limited English-speaking capability. The extension will not
18 interfere with any other case deadlines, and no other deadlines need to change.

19 Accordingly, the parties respectfully request that the Court extend the deadline for Moving
20 Counterclaim Defendants to answer or otherwise respond to the Counterclaim, as set forth in this
21 stipulation.

1 **IT IS SO ORDERED** this ____ day of September, 2023.

2 _____
3 HONORABLE JOHN H. CHUN
4 UNITED STATES DISTRICT JUDGE

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6 DATED this 1st day of September, 2023

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9 STERNE KESSLER GOLDSTEIN & FOX
10 PLLC

DORSEY & WHITNEY LLP

11 /s/ Josephine Kim

12 Nirav Desai
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11 /s/ Paul T. Meiklejohn

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24
25 ATTORNEYS FOR DEFENDANT AND
COUNTERCLAIM PLAINTIFF CHIARO
TECHNOLOGY, LTD.

ATTORNEYS FOR PLAINTIFFS
SHENZHEN ROOT TECHNOLOGY CO.,
LTD., HONG KONG LUTE
TECHNOLOGY CO., LIMITED, AND
SHENZHEN CONGLIN E-COMMERCE
CO., LTD. AND COUNTERCLAIM
DEFENDANTS SHENZHEN ROOT
TECHNOLOGY CO., LTD., HONG KONG
LUTE TECHNOLOGY CO., LIMITED,
SHENZHEN CONGLIN E-COMMERCE
CO., LTD., SHENZHEN JINRUIHANG
TECHNOLOGY CO., LTD., AND
SHENZHEN LUTEJIACHENG NETWORK
TECHNOLOGY CO., LTD.

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record via ECF Notification:

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Dated this 1st day of September, 2023.

/s/Paul T. Meiklejohn

Paul T. Meiklejohn